

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Minnesota Chamber of Commerce, *a*
Minnesota nonprofit corporation,

Plaintiff,

vs.

John Choi, *in his official capacity as*
County Attorney for Ramsey County,
Minnesota; George Soule, *in his official*
capacity as Chair of the Minnesota
Campaign Finance and Public Disclosure
Board; David Asp, *in his official capacity*
as Vice Chair of the Minnesota Campaign
Finance and Public Disclosure Board;
Carol Flynn, *in her official capacity as*
Member of the Minnesota Campaign
Finance and Public Disclosure Board;
Dave Kleis, *in his official capacity as*
Member of the Minnesota Campaign
Finance and Public Disclosure Board;
Stephen Swanson, *in his official capacity*
as Member of the Minnesota Campaign
Finance and Public Disclosure Board; and
Faris Rashid, *in his official capacity as*
Member of the Minnesota Campaign
Finance and Public Disclosure Board,

Defendants

Case No.: 23-CV-02015 (ECT/JFD)

**STIPULATION FOR
SUBMISSIONS RELATING TO
PLAINTIFF’S PETITION FOR
ATTORNEY’S FEES AND
COSTS**

Plaintiff intends to file a Petition for Attorney’s Fees and Costs and associated submissions, to which Defendants anticipate filing responsive submissions. The parties have met and conferred about a briefing schedule, and stipulate to request the Court to order these submissions be made pursuant to the following briefing schedule and terms:

1. Plaintiff will file its petition and associated submissions by February 21, 2025—these submissions will not include an engaged expert’s declaration addressing the reasonableness of the hourly rates and fees charged in this matter;
2. Defendants will file their submissions responding to Plaintiff’s petition by March 3, 2025—if Defendants’ responsive submissions do not object to the reasonableness of the hourly rates and fees, then Plaintiff will not engage an expert to submit a declaration on the reasonableness of the hourly rates and fees charged in this matter;
3. Plaintiff will file its reply submission by March 17, 2025—if Defendants’ responsive submissions object to the reasonableness of the hourly rates and fees charged in this matter, then Plaintiff may submit an engaged expert’s declaration with its reply;
4. If Plaintiff submits an engaged expert’s declaration with its reply, then Defendants may submit a sur-reply by March 24, 2025;
5. Hearing on Plaintiff’s petition will be scheduled by the Court.

So stipulated:

Dated: February 18, 2025

WINTHROP & WEINSTINE, P.A.

s/Thomas H. Boyd

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Attorneys for Plaintiff

Dated: February 18, 2025

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Ramsey County Attorney

Dated: February 18, 2025

s/ Kristine Nogosek

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